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14 DAL GLOBAL SERVICES, LLC,
15 aka DELTA GLOBAL SERVICES

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18 HIRAM JOHNSON,

19 Plaintiff,

20 v.

21 DAL GLOBAL SERVICES, LLC, aka
22 DELTA GLOBAL SERVICES,

23 Defendant.

Case No. 3:21-cv-00441-LRH-CLB

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADING**

[FIRST REQUEST]

24 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff HIRAM JOHNSON (“Plaintiff”) and Defendant
25 DAL GLOBAL SERVICES, LLC aka DELTA GLOBAL SERVICES (“Defendant”) by and
26 through their undersigned counsel, hereby agree and stipulate to extend the time for Defendant to
27 file a responsive pleading from the current deadline of October 29, 2021, up to and including
28 **November 19, 2021.**

Such extension is necessary in light of the fact that Defendant’s counsel was only recently
retained. The additional time will allow defense counsel to continue to investigate the allegations
in the Complaint and prepare a sufficient responsive pleading.

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1 This is the first request for an extension of time to respond to the Complaint. This request
2 is made in good faith and not for the purpose of delay.

3 Dated: October 26, 2021

Dated: October 26, 2021

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Terri Keyser-Cooper

7 TERRI KEYSER-COOPER, ESQ.
8 LAW OFFICES OF TERRI KEYSER-
COOPER

9 *Attorney for Plaintiff*
HIRAM JOHNSON

/s/ Steven J.T. Washington

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ETHAN D. THOMAS, ESQ.
STEVEN J.T. WASHINGTON, ESQ.
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Attorneys for Defendants
DAL GLOBAL SERVICES, LLC,
aka DELTA GLOBAL SERVICES

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12 **IT IS SO ORDERED.**

13 Dated: October 26, 2021.

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15 
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17 UNITED STATES MAGISTRATE JUDGE

18 4857-2377-7280.1 / 111197-1023